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Attorneys for Plaintiffs
CONTINENTAL CASUALTY COMPANY

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CONTINENTAL CASUALTY
COMPANY,

Plaintiff,

v.

STANTON, KAY & WATSON, LLP;
JAMES WATSON; EDWARD MEVI,

Defendants.

No. C 05-5333 MJJ

AMENDED JOINT STIPULATION AND
~~PROPOSED~~ ORDER REVISING CASE
MANAGEMENT SCHEDULE

WHEREAS, this is an action by Continental Casualty Company ("Continental") for a declaratory judgment regarding its rights and obligations under Lawyers Professional Liability Policy No. LAW-267838485, issued to Defendant Stanton, Kay & Watson, LLP (the "Policy");

WHEREAS, Continental seeks a determination that it is entitled to rescind the Policy, or, in the alternative, no coverage is available under the Policy for the actions styled Pension Trust

Fund for Operating Engineers Local 3, et al. v. McMorgan & Co., et al., Case No. 06AS01323
 (Sacramento Super.); Pension Trust Fund for Operating Engineers Local 3, et al. v. McMorgan &
Co., et al., Case No. 06AS01324 (Sacramento Super.); and Pension Trust Fund for Operating
Engineers Local 3, et al. v. McMorgan & Co., et al., Case No. 06AS01325 (Sacramento Super.)
 (collectively, the “Underlying Actions”);

WHEREAS, Defendants dispute Continental’s position;

WHEREAS, the parties to the instant action and the parties to the Underlying Actions
 have agreed to participate in a joint mediation;

WHEREAS, because the Underlying Actions need to be considered in any mediation of
 the instant action, mediation of the instant action alone would likely be unsuccessful;

WHEREAS, at the request of the parties to the Underlying Actions, the joint mediation
 that was to take place in February 2007 will now take place on May 15 & 16, 2007, all parties,
 counsel, and the mediator having confirmed availability;

WHEREAS, the parties wish to extend the deadline set in the instant action for completing
 mediation;

WHEREAS, to avoid unnecessary expense should the parties be able to resolve the instant
 action at mediation, the parties wish to extend the discovery and motion deadlines in the instant
 action;

WHEREAS, the parties are *not* seeking to continue the trial date, the pre-trial conference
date, or the mandatory settlement conference date.

WHEREFORE, IT IS HEREBY STIPULATED by and between the parties that

- (1) the mediation deadline be extended to May 31, 2007;
- (2) the non-expert discovery cut-off be extended to July 18, 2007;
- (3) the deadline for designating experts be extended to July 16, 2007;
- (4) the deadline for expert reports be extended to July 23, 2007;
- (5) the deadline for supplemental/rebuttal expert reports be extended

to August 6, 2007;

- (6) the expert discovery cut-off be extended to August 13, 2007;

(7) the deadline for dispositive motions to be heard be extended to September 21, 2007; and

(8) the trial date (November 19, 2007), the pre-trial conference date (November 6, 2007), and the date for the mandatory settlement conference (October 25, 2007) remain the same.

DATED: March 30, 2007

ROSS, DIXON & BELL, LLP

By: /s/

RICHARD A. SIMPSON
JENNIFER MATHIS
BECKI F. KIEFFER
Attorneys for Plaintiff
CONTINENTAL CASUALTY
COMPANY

DATED: March 30, 2007

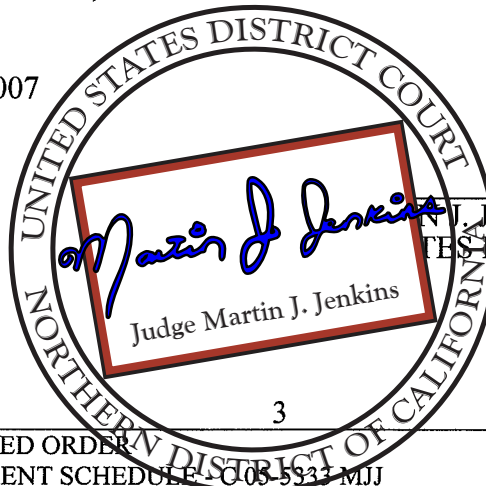
HANSON BRIDGETT MARCUS
VLACHOS & RUDY, LLP

By: /s/

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BATYA F. SWENSON
LORIANNE G. CONKLIN
Attorneys for Defendants
STANTON, KAY & WATSON, LLP,
EDWARD MEVI, AND JAMES
WATSON

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: 04/03, 2007



MARTIN J. JENKINS
DISTRICT COURT JUDGE